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14 Attorneys for Defendants ANDREW KARAM, ANTHONY  
15 SOOHOO AND MERRILEE SOOHOO REVOCABLE TRUST,  
16 JOHN AND ISABELLE KRYSTYNAK 2011 FAMILY TRUST,  
17 ADAM AND JACLYN FOROUGHII 2011 FAMILY TRUST,  
18 VANDANA SHAH AND PRAFUL SHAH REVOCABLE  
19 LIVING TRUST, 500 STARTUPS L.P., AND ROSE PARTNERS  
20 LLC

21 UNITED STATES DISTRICT COURT  
22 NORTHERN DISTRICT OF CALIFORNIA  
23 OAKLAND DIVISION

24 DAN VIGDOR, an individual; STEPHEN  
25 BRADWAY, an individual,

26 Plaintiffs,

27 v.

28 ANDREW KARAM, an individual; et al.

Defendants.

Case No. 4:18-cv-04573-HSG

**STIPULATION TO CONTINUE CASE  
MANAGEMENT CONFERENCE AND  
ORDER**

Dept.: Courtroom 2 - 4th Floor

Judge: Hon. Haywood S. Gilliam, Jr.

Trial Date: Not Yet Set

1 Pursuant to Civil Local Rules 6-1 and 6-2 of the Northern District of California, the  
2 parties to this lawsuit Plaintiffs Dan Vigdor and Stephen Bradway (“Plaintiffs”) and Defendants  
3 Andrew Karam, Anthony Soohoo and Merrilee Soohoo Revocable Trust, John and Isabelle  
4 Krystynak 2011 Family Trust, Adam and Jaclyn Foroughi 2011 Family Trust, Vandana Shah and  
5 Praful Shah Revocable Living Trust, 500 Startups L.P., and Rose Partners LLC and Karl Jacob III  
6 (“Defendants”), by and through their respective counsel, hereby stipulate to the following:

7 WHEREAS, the initial case management conference in this matter is currently set for  
8 November 6, 2018;

9 WHEREAS, Defendants have noticed their motion to dismiss for December 6, 2018;

10 WHEREAS, the parties to this action agree that continuing the initial case management  
11 conference until the December 6, 2018 hearing would promote judicial economy and conserve  
12 party resources;

13 WHEREAS, the parties to this action have not previously modified timelines in this case;  
14 and

15 WHEREAS, the Court has not yet set a schedule for this case within the meaning of Civil  
16 Local Rule 6-2(a)(3);

17 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE to and request that the  
18 Court CONTINUE the November 6, 2018 case management conference to December 6, 2018  
19 when all counsel in this and the related action will be present in Court.

20 IT IS SO STIPULATED.  
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1 Dated: October 3, 2018

KEKER, VAN NEST & PETERS LLP

2 By: /s/ Benedict Y. Hur

3 BENEDICT Y. HUR  
4 JULIA L. ALLEN  
5 SHAYNE HENRY  
6 SARAH SALOMON

7 Attorneys for Defendants  
8 ANDREW KARAM, ANTHONY  
9 SOOHOO AND MERRILEE SOOHOO  
10 REVOCABLE TRUST, JOHN AND  
11 ISABELLE KRYSTYNAK 2011 FAMILY  
12 TRUST, ADAM AND JACLYN  
13 FOROUGH 2011 FAMILY TRUST,  
14 VANDANA SHAH AND PRAFUL SHAH  
15 REVOCABLE LIVING TRUST, 500  
16 STARTUPS L.P., AND ROSE PARTNERS  
17 LLC

12 Dated: October 3, 2018

GOODWIN PROCTER LLP

13 By: /s/ Nicole L. Chessari

14 LLOYD WINAWER  
15 NICOLE L. CHESSARI

16 Attorneys for Defendant  
17 KARL JACOB III

17 Dated: October 3, 2018

MICHELMAN ROBINSON LLP

18 By: /s/ Marc Russell Jacobs

19 MARC RUSSELL JACOBS

20 Attorneys for Plaintiffs  
21 DAN VIGDOR and  
22 STEPHEN BRADWAY


23 *\*Pursuant to Civil Local Rule 5-1, the attorney filing this document attests that he has obtained*  
24 *concurrence in the filing of this document from all other signatories.*  
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**ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: October 10, 2018

  
HON. HAYWOOD S. GILLIAM, JR.  
UNITED STATES DISTRICT COURT JUDGE